

REMARKS

Claims 5-6 and 14-20 are pending in the Application.

Claims 5-6 and 14-20 stand rejected.

The Examiner has reasserted the Section 102 and Section 103 rejections from Paper No. 12. Applicants continue to traverse such rejections for the reasons given previously by Applicants. In Applicants' previous response, Applicants asserted that the *Carney* reference is not prior art, since the provisional applications from which the present Application depends pre-date the filing date of the *Carney* patent application, and the *Carney* provisional application does not support the *Carney* application sufficiently for the Examiner's rejection (which the Examiner has not refuted).

In Paper No. 17, the Examiner has asserted that the provisional applications from which the present Application claim priority are insufficient to support claims 14 and 19 of the present Application.

Applicants have had several telephone conferences with the Examiner in an attempt to convince the Examiner that the provisionals do provide such support, but the Examiner remains in disagreement. Applicants thank the Examiner for his considerable time and effort in discussing this issue.

The Examiner concluded that if Applicants wish to traverse the Examiner's assertions, Applicants should put such a traversal in writing, explaining how claims 14 and 19 are supported by the provisional applications. Applicants believe that the provisional applications do support claims 14 and 19, and will explain so with the following arguments, accompanied by the attached drawing.

The present Application claims priority to two provisional applications. The first of these applications is Serial No. 60/147,673, and the second provisional application is 60/130,602. In the telephone conferences between the Examiner and Applicants' attorney, Applicants' attorney made use of the '673 application to argue that it supported claims 14 and 19. Applicants' attorney now sees that the additional description in the '673 application of FIGURE 4 may have confused the Examiner

as to what was disclosed in the provisional applications for support of claims 14 and 19. As a result, Applicants will now make use of the '602 provisional application to support claims 14 and 19; the disclosure relied upon in the '602 application is also present in the '673 provisional patent application.

Claim 14 recites "providing a first electronic billboard at a first location" and "providing a second electronic billboard at a second location." FIGURE 2 in the '602 application shows an electronic billboard with a capability of displaying still or video images in a manner similar to a television or a computer display. (Page 5, lines 8-10.) FIGURE 1 illustrates an example of electronic billboards, noted by X's, throughout the United States, or even worldwide, wherein the various billboards are located across a geographic area. (Page 5, lines 16-19.) Thus, the Specification and FIGURES 1 and 2 of the '602 provisional patent application support providing first and second electronic billboards at first and second locations.

Claim 14 further recites "coupling a first information handling system to the first electronic billboard so that the first information handling system can control information to be displayed on the first electronic billboard." Claim 14 also recites "coupling a second information handling system to the second electronic billboard so that the second information handling system can control information to be displayed on the second electronic billboard." Page 5, lines 8-19 of the '602 provisional patent application discloses multiple electronic billboards located in multiple geographic locations. The '602 Specification also discloses that there will be a processor and memory device, along with driver electronics and software located at the electronic billboard site, such as the one illustrated in FIGURE 2, so that images to be displayed can be stored within that memory, and then are displayed in a desired manner using software at that electronic billboard site. Again, since the Specification illustrates a multiple of the FIGURE 2 electronic billboards at the multiple sites shown in FIGURE 1, and since the Specification discloses that at the electronic billboard site, there will be a processor and memory device along with driver electronics and software, there is thus an information handling system associated with each of the electronic billboards for controlling the display of the images on each particular electronic billboard. Therefore, the '602 Specification

discloses first and second information handling systems where the first information handling system is coupled to the first electronic billboard for controlling information to be displayed on that first electronic billboard, and a second information handling system is coupled to the second electronic billboard to control information to be displayed on the second electronic billboard. The attached block diagram further illustrates these claim limitations as supported within the '602 Specification.

Claim 14 then recites "coupling the first and second information handling systems to a third information handling system over a digital television broadcast network." This third information handling system is disclosed in the '602 Specification as the client's computer, the client being a party wishing to have one of their advertisements displayed on a selected electronic billboard. The '602 Specification discloses a client who wishes to display their ad on a particular billboard will log onto a network, such as the Internet, and visit the website operated by the billboard provider. This discloses what is well-known in the art as a client using a computer (third information handling system) to log onto a network, such as the Internet, to visit a website. Thus, Applicants respectfully assert that the third information handling system is disclosed within the provisional patent applications. Such a third information handling system (client's computer) is clearly disclosed as being coupled to an information handling system operating the website of the billboard provider. This is shown in the attached figure as the third information handling system being coupled to the billboard provider website, which would be naturally run by some type of information handling system, or server, through a network. Page 7, lines 1-11 describe how such a client will prepare an ad for display on a selected billboard, and then upload such an ad to the billboard provider at a central location where the billboard provider can approve the ad for display. Alternatively, certain clients may be able to skip step 308 and upload their ad directly to the billboard system. Page 7, lines 9-11. The billboard system will then display the ad at the desired time and duration. This is also disclosed on page 5, lines 14-16 where it states that ads can be uploaded to the billboard system, which is described on page 5, lines 8-11. The billboard system as described comprises the electronic billboard and the processor, memory device, driver electronics and software associated with such electronic billboard. Thus, the '602 Specification describes how the third information handling system, being

the client computer, is coupled through a network to a centrally located information handling system of the billboard provider, which is coupled by a network to the first and second information handling systems. Alternatively, the '602 Specification describes how the third information handling system may be directly coupled through a network to the first and second information handling systems for direct uploading of ads to such billboard systems. Either way, the '602 Specification supports the limitation of coupling the first and second information handling systems to a third information handling system over a network.

Claim 14 also recites that the network is a digital television broadcast network. Applicants respectfully assert that this is also supported by both provisional patent applications. Page 5, line 14 of the '602 application discloses that the ads can be uploaded to the billboard system using various telecommunication systems, including cable. Page 6, lines 4-6 describe how the third information handling system (client computer) will access the billboard provider website over a network. It is well known in the art that access to the Internet may be provided using a cable network. In the '673 application, it is described how data transmission to and from the billboards can be performed using cable technologies. Page 8, lines 17-20. From the attached drawing, it can be then observed that the network connection from the third information handling system to the billboard provider website can be over a cable network, and the provisional applications also disclose how the ads can be uploaded to the billboard systems over a cable telecommunications system. As a result, Applicants respectfully assert that the provisional applications disclose that the first and second information handling systems of the first and second electronic billboard systems are coupled to the client computer (third information handling system) by a digital television broadcast network. Furthermore, in the Section 102 rejection of claims 14 and 19 in Paper No. 17, the Examiner has asserted that *Carney* discloses such a coupling of these information handling systems over a digital television network by its teaching of the use of a cable network in column 3, line 6 for each of the Internet "clouds" 22 shown in Figure 3. Therefore, by the Examiner's own admission, the limitation "digital television broadcast network" reads on a cable network, and thus this claim limitation is supported within the provisional patent applications.

Claim 14 also recites “selecting, via the third information handling system, which of the first and second electronic billboards will display the information.” FIGURE 3 describes how a client using the third information handling system can log onto the website operated by the billboard provider over a network (Page 6, lines 4-6). In step 302, the client will view a list or map of the various billboards, in this case, the first and second electronic billboards, to decide which one will display the advertisement. In step 303, the client will select the desired billboard from the list or map. (Page 6, lines 4-13.)

Claim 14 recites uploading the information from the third information handling system over the Internet to the information handling system controlling the selected electronic billboard. This is disclosed on page 7, lines 9-11 where clients may be able to upload their ad directly to the billboard system, which would be the billboard selected by the client, and as asserted above, the billboard system of such a billboard would include an information handling system to control the display of the information on that particular billboard. Applicants respectfully assert that even if the ad was first sent to the central location of the billboard provider, and then sent from such a central located system to the billboard system of the selected billboard, that this “uploading” step would still be supported.

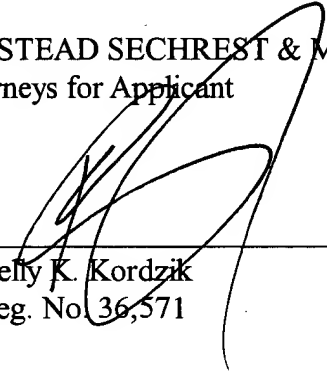
Naturally, the step of displaying the information on the selected electronic billboard is supported within the provisional patent application specifications. For example, see page 7, lines 12-13.

Applicants respectfully assert that claim 19 is supported for the same reasons as given above with respect to claim 14.

As a result of the foregoing, Applicants respectfully assert that the '673 and '602 provisional patent applications adequately support the claims remaining in the patent application.

Respectfully submitted,

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